

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA**

EARL GAVIN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CASE NO. : 7:18-cv-00523-AMQ-JDA
EXPERIAN INFORMATION SOLUTIONS	)	
INC., et al.	)	
	)	
Defendants.	)	

**DEFENDANT EQUIFAX INC.'S  
STATEMENT OF NON-OPPOSITION TO PLAINTIFF'S  
MOTION TO AMEND COMPLAINT**

Defendant Equifax Inc. ("Equifax"), by counsel, hereby gives notice to the Court that it does not oppose Plaintiffs' Motion to Amend Complaint given that the motion was filed on April 5, 2018, a little more than two months after the initial complaint was filed on February 22, 2018. However, Equifax opposes the substance of Plaintiff's proposed Amended Complaint and intends to file a Motion to Dismiss at the appropriate time. Equifax expressly reserves, and does not waive, its defenses to the proposed Amended Complaint, including (but not limited to) failure to state a claim upon which relief may be granted.

Respectfully submitted this 18th day of April, 2018.

/s/ Rita Bolt Barker  
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*Attorneys for Defendant Equifax Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true and correct copy of the foregoing by  
CM/ECF, which will send notification to the following counsel of record:

Lyndey Ritz Zwingelberg  
Adams and Reese  
1501 Main Street  
Fifth Floor  
Columbia, SC 29201

Wilbur Eugene Johnson  
Young Clement Rivers  
PO Box 993  
Charleston, SC 29402

And via U.S. Mail to:

Earl Gavin  
300 Marion Avenue  
Gaffney, SC 29341

Dated: April 18, 2018.

/s/ Rita Bolt Barker